

## United States District Court

OCT - 6 2014 CLR

SOUTHERN

DISTRICT OF

TEXAS

Laredo Division

UNITED STATES OF AMERICA

V.

Jose LEAL  
Laredo, Texas  
United States

(Name and Address of Defendant)

## CRIMINAL COMPLAINT

Case Number: 5:14 mj 1292-1

I, the undersigned complainant state that the following is true and correct to the best of my

knowledge and belief. On or about October 4, 2014 in Laredo, Texas Webb County, in  
(Date)  
the Southern District of Texas, Jose LEAL defendant(s),

a United States Citizen, did unlawfully transport Mexican nationals Alejandro LEON-Pena and Anayelli JUAREZ-Trejo, along with three others, within the Southern District of Texas, knowing or in reckless disregard of the fact that said aliens had come to, entered, or remained in the United States in violation of law, and transported or moved said aliens within the United States by means of motor vehicle or otherwise, in furtherance of such violation of law.

in violation of Title 8 United States Code, Section(s)

1324

I further state that I am a(n) Homeland Security Investigations Taskforce Officer and that this complaint is based  
Official Title

on the following facts: based on statements of the accused and the records of the Immigration &amp; Customs Enforcement.

Continued on the attached sheet and made a part of this complaint:

☒ Yes☐ No

Signature of Complainant

David Parker

Printed Name of Complainant

Sworn to before me and signed in my presence,

October 6, 2014

Date

at

Laredo, Texas

City and State

J. Scott Hacker

U.S. Magistrate Judge

Name and Title of Judicial Officer

Signature of Judicial Officer

United States of America

Page 2

vs

Jose LEAL

[CONT OF BASIS OF COMPLAINT]

On October 4, 2014, Special Agents with Homeland Security Investigations (HSI), Laredo, Texas received a request for investigative assistance from Border Patrol Agents assigned to the Laredo North Border Patrol Station, Laredo, Texas. The investigative request involved the attempted smuggling of eight undocumented aliens with endangerment. Special Agents responded to the Laredo South Border Patrol station and were advised of the following:

On October 4, 2014, Border Patrol Agents assigned to the Laredo North Border Patrol Station received notification of an assistance request by the Webb County Sheriffs Office. Agents responded to Highway 59 near the Laredo Rifle and Pistol Club Range near Laredo, Texas.

At approximately 11:00 p.m., Agents arrived on the scene on Hwy 59 to assist Webb County Sheriffs Deputies. Agents stated Deputy Sheriffs had taken nine individuals into custody. Agents spoke with Deputy Sheriff who advised he had first observed a white in color Chevrolet pickup truck traveling north on Hwy 59 with no headlights active. Deputies advised that is the point they attempted to conduct a vehicle stop of the Chevrolet.

Agents advised that Deputies stated a short vehicle pursuit ensued with the driver, later identified as Jose LEAL, driving off the side of the highway and bringing the truck to a stop. Deputies noted that when the truck first left the roadway, multiple individuals could be seen bouncing up in the bed area of the truck. Deputies advised when the vehicle came to a stop, multiple individuals exited the passenger area of the truck and absconded into the nearby ranch.

Agents stated Deputies said they made an approach of the truck and discovered eight subjects lying in the bed area of the truck and driver (Jose LEAL) still seated in the driver's seat. Deputies advised they suspected the individuals in the bed of the truck were present in the United States illegally and requested assistance by the United States Border Patrol.

Agents advised an immigration inspection on the nine individuals revealed the driver, LEAL, was a United States Citizen and the other eight individuals freely admitted to being present in the United States illegally. All subjects were transported to the Laredo North Border Patrol Station for further processing.

Homeland Security Investigations Special Agents and Taskforce Officers advised LEAL of his rights via ICE Form 73-025. Williams invoked his right to counsel and stated he did not wish to make any statements. LEAL was subsequently arrested for 8 USC 1324, Alien Smuggling.

Alejandro LEON-Pena and Anayelli Juarez-Trejo were part of the group attempting to be smuggled. Both subjects will be held and used as material witnesses in this case.